## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LA PLAY	YITA CICERO, INC., et al.		
Plaintiffs,		Case No. 11 CV 1702	
v.	)		
TOWN (	OF CICERO, et al.		
Defendar	its. )		
LA PLAY	/ITA CICERO, INC., et al.		
Plaintiffs, )		Case No. 11 CV 5561	
v. TOWN (	OF CICERO,		
Defendar	nt.		
	EFENDANTS REVISED' CONSO IENT AND MEMORANDUM IN S		
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	<ul> <li>A. No Discriminatory Intent</li> <li>B. No Discriminatory Effect</li> <li>C. Claim with Respect to February of 2007Amendment of Town Liquor Ordinance</li> <li>First Amendment Retaliation</li> <li>A. Case No. 11 CV 5561</li> <li>B. Case No. 11 CV 1702</li> <li>C. Probable Cause as Defense to First Amendment Retaliation With Respect to October of 2009 Arrest for Battery –</li> </ul>

VIII. No Basis for "Widespread Pattern and Practice" <u>Monell</u> Liability for Town 17-18 in Equal Protection or First Amendment Claims